

Remarks

This response is filed with a Request for Continued Examination (RCE) and is to the Office Action mailed in the above-referenced case on December 3, 2003 made Final. Claims 1-25 are present below for examination. The Examiner has maintained the 102(e) rejection of the claims as being anticipated by Sonesh.

Applicant has again carefully studied the reference of Sonesh, and the Examiner's statements of the instant Office Action. In response to the rejection, applicant provides further arguments to more particularly point out the subject matter of applicant's invention regarded as patentable, which clearly distinguishes applicant's invention over the prior art presented. Applicant points out and argues the key limitations of applicant's claims which appear to be misunderstood by the Examiner in the rejection and statements.

Applicant's previous argument that the reference of Sonesh does not teach establishing a remote agent station from a call center comprising all of the specific steps of applicant's claims, was not persuasive to the Examiner. In the Response to Arguments section of the instant Office Action, the Examiner kindly responds to applicant's argument, stating that Sonesh teaches establishing a remote agent station from a call center comprising the specific steps of first, determining the routing for the call to be the remote agent station, then retrieving data associated with the call, forwarding the associated data to the remote station before call connection to the remote station, and then placing the call from the call center to the remote station and switching the call to the remote station. Applicant asserts that Sonesh clearly does not anticipate all of applicant's limitations in the base claims, and does not teach all of the method steps of applicant's claims, in the order in which they are recited in the claims, which is required for a prima facie rejection.

Firstly, applicant wishes to direct the Examiner's attention to applicant's step (c) of claim 1, which specifically recites "retrieving data associated with the selected incoming call from a database at the call center, and step (d), which

recites "forwarding the data associated with the selected incoming call to the computer platform at the remote agent station via the data link", both steps (c) and (d) occurring before the actual placing and switching of the incoming call to the remote station. Referring now to claim 1, with reference to Fig. 1, in a preferred embodiment of applicant's invention, wherein the data connection is kept active until the remote agent logs off, when a call arrives at the telephony switch 109 and it is determined that the routing for the call is to be the remote agent, router 118 directs the switch to transfer the call to the remote agent, and data associated with the incoming call is then retrieved from database 113. The additional data associated with the call is retrieved (step (c)) from the database using information derived from the call, and is forwarded (step (d)) to the remote agent station via the always-open data connection. In this manner a screen pop-up with pertinent client information, or even a script to assist the agent in the interaction with the client, may be displayed at the agent station by the time the call actually arrives, or even before the call arrives at the agent station. Both steps (c) and (d) above, clearly occur before the incoming call is connected to the remote station, and retrieving data associated with the incoming call from a database, and forwarding it to the remote agent at the time of, or even before the call arrives, is very important to applicant's invention, and the specific method steps of applicant's and claims, in the order in which they are recited, are clearly not anticipated by Sonesh.



The Examiner has stated that Sonesh teaches retrieving data associated with the call (col. 7, lines 17-21 and col. 7, lines 61-65), and forwarding the associated data to the remote station display unit before call connection to the remote station (col. 8, lines 1-7). Applicant must respectfully point out, however, that Sonesh does not teach retrieving associated data from a database at the call center, as is specifically recited in applicant's independent claims 1 and 8. The data retrieved in Sonesh is simply the caller's identity, which is determined from the data protocol, address of a data packet, from authentication information carried by a protocol, or possibly manually typed in by the caller, and the data may

include the caller's selection of service and/or area of interest, which is also input by the caller at the time of placing the call. The agent or group of agents is selected for routing the call based on this information. There is no teaching or reference anywhere in Sonesh, however, that the associated data is retrieved from a database at the call center, as is taught in applicant's invention and recited in the claims. Applicant asserts that the teachings of Sonesh pertaining specifically to retrieval of data associated with the incoming call refer only to caller identification, and service requested, and/or area of interest selected by the caller, and none of the data is stored in, or retrieved from a database at the call center.

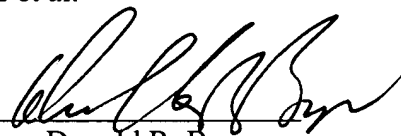
Sonesh discloses (col. 10, lines 30-33) col. with reference to Fig. 5, that the distributed call centers 501 and 502 and remote agents 503 have the ability to share databases and other call center administration data, but there is no specific teaching that the data shared is data associated with the incoming call, or that it is automatically retrieved and forwarded to the remote station, at the time of, or even before arrival of the incoming call at the remote station, as taught in applicant's invention. Any data required by the remote station is retrieved by the remote station from the shared databases only after arrival of the incoming call at the remote station. The teachings pertaining to retrieving and forwarding data associated with the incoming call are vague and inconclusive, and therefore cannot read on the specific limitations applicant's claims.

Applicant therefore believes that independent claim 1 is clearly and unarguably patentable over Sonesh. Applicant's claims 8, 15 and 20 recite methods for establishing a remote agent station from a call center, and a home agent call center system in accordance with claim 1, reciting similar limitations. Applicant believes claims 8, 15 and 20 are then also patentable over the prior art, as argued above by applicant on behalf of claim 1. Claims 2-7, 9-14, 16-19, and 21-25 are then patentable on their own merits, or at least as depended from a patentable claim

Applicant therefore respectfully requests reconsideration, and that the present case be passed quickly to issue. If there are any extensions of time

required, such extensions are hereby requested. If there are any fees due, authorization is given to deduct the fees from deposit account 50-0534.

Respectfully Submitted,
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